

### REMARKS

Reconsideration and timely allowance of the pending claims in view of the following remarks, are respectively requested.

By this Amendment, claims 11-14 and 21-23 are presented for examination, of which independent claims 11 and 21 have been amended. Applicants submit that no new matter has been introduced.

I. Submission IDS with corrected Inventor's Name

The Examiner objected to the IDS submitted on November 13, 2006, for failing to properly indicate the inventor and/or the patentee. Pursuant to the Examiner's request Applicants have submitted herewith, a new IDS, and supporting Form PTO-1449, properly listing: JP 2001-141873, to Kurata et al. Appropriate consideration and return of the initialed PTO-1449, with the next communication from the Examiner is respectively requested.

II. Claim Rejections - 35 U.S.C. § 102 and § 103

The Examiner rejected Claims 11-14 and 21-23 under 35 U.S.C. § 102(b) as allegedly being anticipated by Paillaman et al. (U.S. 2002/0080905 A1); and rejected Claims 11-14 and 21-23 under 35 U.S.C. § 102(e) as allegedly being unpatentable over Ganoza et al. (US 2003/0085301 A1). The Examiner also notes that these rejections are provided subject to the noted indefiniteness under the 35 U.S.C. § 112 overleaf, in the prior Office Action. Applicants believe that any remaining 35 U.S.C. § 112 rejections have been obviated with the above amendments to the claims, and that a good faith attempt has been made to interpret the Examiner's general application of the prior 35 U.S.C. § 112 rejections. However, the

Applicants preserve the right to make further amendments to the claims in light of a more specific application of 35 U.S.C. § 112. These rejections are respectively traversed.

As noted above, independent Claim 11 sets forth an apparatus for executing an operation in a vessel of a nuclear reactor, and positively recites, *inter alia*, a fully-immersionable body capable of being suspended and lowered into the vessel during operation, and a guide having an inclined surface with respect to a vertical axis of the body when the body is suspended, wherein the guide is movably supported at a lower portion of the body so that the inclined surface is first inserted into the pump when the body is suspended and lowered into the vessel to adaptively vary the orientation of the guide in order to correspond to an interior surface of the pump as insertion proceeds. These claim features are amply supported by the embodiments disclosed in the Specification. See, for example, Specification, paragraph 0006.

Applicants submit that, in dramatic contrast to the claimed invention, none of the asserted references, teach or suggest each and every element of at least Claim 11, including the features identified above. With regards to Paillaman, the apparatus employs a frame-based structure that must be rigidly attached to the body of the equipment that will be inspected. That is to say, that a large portion of the Paillaman apparatus must be supported by the external housing of the equipment to be inspected. See, Paillaman, for example, Fig. 4, and paragraph 0009. With regards to Ganoza, the apparatus employs a pole adapter 90 that is rigidly attached to a tubing section 82, for example. Similarly, with Ganoza, a large portion of the apparatus must be supported by the external housing of the equipment to be inspected. See, Ganoza, for example, at Fig. 4 and paragraphs 0020-0022. That is, as best understood, there is simply nothing in Paillaman or Ganoza that even remotely suggests a combination of a fully-immersionable body of an operation apparatus having a guide at a lower portion into the pressure vessel, and a guide having an inclined surface with respect to

a vertical axis of the body when the body is suspended, wherein the guide is movably supported at a lower portion of the body so that the inclined surface is first inserted into the pump when the body is suspended and lowered into the vessel to adaptively vary the orientation of the guide in order to correspond to an interior surface of the pump as insertion proceeds, as required by Claim 11.

For at least these reasons, Applicants submit that none of the asserted references, taken under Section 102 teach or suggest the claimed combination of elements, or their equivalent, recited by amended Claim 11, and similarly as recited by amended claim 21. As such, Claims 11 and 21 are clearly patentable. Because Claims 12-14, and 22-23 depend from Claims 11 and 21, respectively, Claims 12-14, and 22-23 are at least patentable by virtue of dependency as well as for their additional recitations. Accordingly, the immediate withdrawal of the prior art rejections, of Claims 11-14 and 21-23 is respectively requested.

### III. Conclusion

All matters having been addressed and in view of the foregoing, Applicants respectively request the entry of this amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicant's Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains an issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

ITO ET AL. -- 10/767,397  
Client/Matter: 008601-0307943

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Respectfully Submitted,  
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